

1 **BATHAEE DUNNE LLP**

2 Yavar Bathaee (CA 282388)
yavar@bathaeedunne.com
3 Andrew C. Wolinsky (CA 345965)
awolinsky@bathaeedunne.com
4 445 Park Avenue, 9th Floor
New York, NY 10022
5 Tel.: (332) 322-8835

6 Brian J. Dunne (CA 275689)
bdunne@bathaeedunne.com
7 Edward M. Grauman (*pro hac vice*)
egrauman@bathaeedunne.com
8 901 South MoPac Expressway
Barton Oaks Plaza I, Suite 300
9 Austin, TX 78746
10 Tel.: (213) 462-2772

11 *Interim Co-Lead Counsel for the*
12 *Advertiser Class*

1 **SCOTT+SCOTT ATTORNEYS AT LAW LLP**

2 Amanda F. Lawrence (*pro hac vice*)
alawrence@scott-scott.com
3 Patrick J. McGahan (*pro hac vice*)
pmcgahan@scott-scott.com
4 Michael P. Srodoski (*pro hac vice*)
msrodoski@scott-scott.com
5 156 South Main Street, P.O. Box 192
Colchester, CT 06415
6 Tel.: (860) 537-5537

7 Patrick J. Coughlin (CA 111070)
pcoughlin@scott-scott.com
8 Carmen A. Medici (CA 248417)
cmedici@scott-scott.com
9 Hal D. Cunningham (CA 243048)
hcunningham@scott-scott.com
10 Daniel J. Brockwell (CA 335983)
dbrockwell@scott-scott.com
11 600 W. Broadway, Suite 3300
San Diego, CA 92101
12 Tel.: (619) 233-4565

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 MAXIMILIAN KLEIN, et al.,

17 Plaintiffs,

18 v.

19 META PLATFORMS, INC.,

20 Defendant.

21 Case No. 3:20-cv-08570-JD

22 Hon. James Donato

23 **[PROPOSED] ORDER REGARDING**
OMNIBUS MOTION TO SEAL
MATERIALS SUBMITTED IN
CONNECTION WITH CLASS
CERTIFICATION AND DAUBERT
BRIEFING AND MERITS EXPERT
PROFFERS IN THE ADVERTISER CASE

1 Having considered Meta Platforms, Inc.'s ("Meta") Omnibus Motion to Seal Materials
 2 Submitted in Connection with Class Certification and *Daubert* Briefing and Merits Expert Proffers
 3 in the Advertiser Case, and materials submitted in support and in opposition thereto;

4 **IT IS HEREBY ORDERED:**

5 Meta's requests to seal the following portions of Advertiser Plaintiffs' ("Advertisers") Motion
 6 for Class Certification and relevant exhibits (Dkt. No. 795), Meta's Opposition to Advertisers' Motion
 7 for Class Certification and relevant exhibits (Dkt. No. 801), Advertisers' Opposition to Meta's Motion
 8 to Exclude Testimony of Michael Williams and relevant exhibits (Dkt. No. 810), Advertisers' Reply
 9 in Support of Motion for Class Certification and relevant exhibits (Dkt. No. 813), Advertisers' Proffer
 10 Regarding Expert Testimony and relevant exhibits (Dkt. No. 824), and Meta's Notice of Errata to
 11 Advertiser Class Rebuttal Report of Catherine Tucker and relevant exhibits (Dkt. No. 828) are
 12 DENIED, and such portions may not be filed under seal unless otherwise indicated as follows:

13 **EXPERT REPORT**

| Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------|------------------------------|--------|
| Advertiser Reply Report of Michael A. Williams, filed at Dkt. Nos. 810-03, 813-03 | | | |
| Ex. B | n. 24, between "Dr. Tucker states:" and "Id. Dr. Tucker's" | Meta (Acharya Decl. Row 118) | |
| Ex. B | n. 24, between "age targeting is associated with over" and "of ad spend" | Meta (Acharya Decl. Row 119) | |
| Ex. B | n. 24, between "geographic targeting is associated with over" and "of ad spend" | Meta (Acharya Decl. Row 120) | |
| Ex. B | n. 24, between "There is" and "ad spend associated only with the Custom" | Meta (Acharya Decl. Row 121) | |
| Ex. B | ¶ 30, between "associated with over" and "of ad spend, and geographic targeting" | Meta (Acharya Decl. Row 122) | |
| Ex. B | ¶ 30, between "geographic targeting was associated with | Meta (Acharya Decl. Row 123) | |

| Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|--------------------------------------|------------------------------------------------------------------------------------|------------------------------|---------------|
| | over” and “of ad spend.” | | |
| Ex. B | n. 26, between “Dr. Tucker states:” and “Id. Dr. Tucker’s statement is” | Meta (Acharya Decl. Row 124) | |
| Ex. B | ¶ 48, between “As shown in Figure 2 below, a” and “of change” | Meta (Acharya Decl. Row 125) | |
| Ex. B | ¶ 48, between “quantity of ads sold leads to a” and “change in Facebook’s capital” | Meta (Acharya Decl. Row 126) | |
| Ex. B | ¶ 48, Figure 2 | Meta (Acharya Decl. Row 127) | |
| Ex. B | ¶ 85, between “opposite result” and “Thus, Facebook advertisers” | Meta (Acharya Decl. Row 128) | |
| Ex. B | ¶ 86, between “is conservative” and “(See Figures A3 and A4 in Appendix II.)” | Meta (Acharya Decl. Row 129) | |
| Ex. B | ¶ 87, final sentence | Meta (Acharya Decl. Row 130) | |
| Ex. B | n. 99, between “accounted for” and “of Facebook’s” | Meta (Acharya Decl. Row 131) | |
| Ex. B | ¶ 114, between “As shown in the figure, Facebook’s CTRs” and “until around 2016” | Meta (Acharya Decl. Row 132) | |
| Ex. B | ¶ 114, between “In the Class Period, Facebook’s CTRs” and “These results” | Meta (Acharya Decl. Row 133) | |
| Ex. B | ¶ 114, between “Given the” and “CTRs in the Class Period” | Meta (Acharya Decl. Row 134) | |
| Ex. B | ¶ 114, Figure 5 | Meta (Acharya Decl. Row 135) | |
| Ex. B | ¶ 140, between “in markets where sellers use” and “this downward pressure” | Meta (Acharya Decl. Row 136) | |

| Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|------------------------------|----------------------------------------------------------------------------------------------|------------------------------|--------|
| Ex. B | ¶ 142, between “by an advertiser in the Class Period is” and “In addition” | Meta (Acharya Decl. Row 137) | |
| Ex. B | ¶ 142, between “In addition” and “of advertisers purchased” | Meta (Acharya Decl. Row 138) | |
| Ex. B | ¶ 142, between “purchased at least” and “Facebook impressions in the Class Period” | Meta (Acharya Decl. Row 139) | |
| Ex. B | ¶ 142, between “advertiser that purchased” and “Facebook impressions purchased at least” | Meta (Acharya Decl. Row 140) | |
| Ex. B | ¶ 146, between “affect the winning price in” and “I never stated” | Meta (Acharya Decl. Row 141) | |
| Ex. B | ¶ 146, between “affecting prices in” and “Instead, I argued” | Meta (Acharya Decl. Row 142) | |
| Ex. B | ¶ 147, between “in her opinion, show that” and “and multilateral negotiations are” | Meta (Acharya Decl. Row 143) | |
| Ex. B | ¶ 147, between “differences between auctions and negotiations” and “Yet, she fails to quote” | Meta (Acharya Decl. Row 144) | |
| Ex. B | ¶ 147, between “stated on the same page” and “Dr. Tucker further references” | Meta (Acharya Decl. Row 145) | |
| Ex. B | n. 172 | Meta (Acharya Decl. Row 146) | |
| Ex. B | ¶ 148, between “what I expect under Facebook’s actual” and “mechanism, where no” | Meta (Acharya Decl. Row 147) | |
| Ex. B | ¶ 148, between “above, under Facebook’s actual” and | Meta (Acharya Decl. Row 148) | |

| Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|------------------------------|----------------------------------------------------------------------------------------|------------------------------|--------|
| | “mechanism, the alleged monopolizing” | | |
| Ex. B | ¶ 148, between “markets where sellers use” and “this upward pressure” | Meta (Acharya Decl. Row 149) | |
| Ex. B | ¶ 149, between “dealership negotiations and Meta’s” and “mechanism as discussed above” | Meta (Acharya Decl. Row 150) | |
| Ex. B | ¶ 149, between “bidder’s ad and the user’ for Meta’s” and “with (2)” | Meta (Acharya Decl. Row 151) | |
| Ex. B | ¶ 149, between “negotiations absent from Meta’s” and “and would not be captured” | Meta (Acharya Decl. Row 152) | |
| Ex. B | ¶ 154, between “that Meta budgeted” and “in 2018” | Meta (Acharya Decl. Row 153) | |
| Ex. B | ¶ 154, between “reveals that only” and “was earmarked” | Meta (Acharya Decl. Row 154) | |
| Ex. B | ¶ 154, between “External Parties’ while” and “was allocated” | Meta (Acharya Decl. Row 155) | |
| Ex. B | ¶ 154, between “members were less than” and “of Meta’s advertising revenue” | Meta (Acharya Decl. Row 156) | |
| Ex. B | n. 191, between “stick with staying at” and “of total ad revenue” | Meta (Acharya Decl. Row 157) | |
| Ex. B | ¶ 155, between “reached as high as” and “percent during the class period.” | Meta (Acharya Decl. Row 158) | |
| Ex. B | ¶ 155, between “produced by | Meta (Acharya Decl. Row 159) | |

| Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|---------------------------|--------------------------------------------------------------------------------------|------------------------------|--------|
| | Facebook, out of' and "that purchased ads" | | |
| Ex. B | ¶ 155, between "in the Class Period, just" and "of those advertisers only purchased" | Meta (Acharya Decl. Row 160) | |
| Ex. B | n. 195 | Meta (Acharya Decl. Row 161) | |
| Ex. B | Figure A1 | Meta (Acharya Decl. Row 162) | |
| Ex. B | Figure A2 | Meta (Acharya Decl. Row 163) | |
| Ex. B | Figure A3 | Meta (Acharya Decl. Row 164) | |
| Ex. B | Figure A4 | Meta (Acharya Decl. Row 165) | |
| Ex. B | Figure A5 | Meta (Acharya Decl. Row 166) | |

OTHER FILINGS

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|-------------------------------------------------------------------|---------------------------|---------------------------------------------------------------------|----------------------------|--------|
| Advertisers' Motion for Class Certification (Dkt. No. 795) | | | | |
| 795-01 | Ex. C1 | 7:2-4, between "in late 2018" and "—e.g.," | Meta (Acharya Decl. Row 1) | |
| 795-01 | Ex. C1 | 7:5, after "exploit—" through end of sentence | Meta (Acharya Decl. Row 2) | |
| 795-01 | Ex. C1 | n. 13, parenthetical after "See Ex. 6 (PX 2989) at 435-36" | Meta (Acharya Decl. Row 3) | |
| 795-01 | Ex. C1 | 7:18-8:1, between "with Ticketmaster as" and "and a May 30, 2017" | Meta (Acharya Decl. Row 4) | |
| 795-01 | Ex. C1 | 8:2, after "restricting Ticketmaster from" through end of line | Meta (Acharya Decl. Row 5) | |
| 795-01 | Ex. C1 | 8:4-8:7, between "restricting Apple from" and "and a July 12, 2017" | Meta (Acharya Decl. Row 6) | |
| 795-01 | Ex. C1 | 8:8-8:9, after "Apple and Meta" through end of line" | Meta (Acharya Decl. Row 7) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------|---------------------------|--------------------------------------------------------------------------------------------------|-----------------------------|--------|
| 795-01 | Ex. C1 | n. 27, between “showing” and “budget reduction” | Meta (Acharya Decl. Row 8) | |
| 795-01 | Ex. C1 | n. 27, between “content, with a” and “and an additional” | Meta (Acharya Decl. Row 9) | |
| 795-01 | Ex. C1 | n. 27, after “and an additional” through end of footnote | Meta (Acharya Decl. Row 10) | |
| 795-01 | Ex. C1 | 10:1-3, between “in 2018, Netflix” and “that after” | Meta (Acharya Decl. Row 11) | |
| 795-01 | Ex. C1 | n. 34, parenthetical after “S. Wang Dep. Tr.” | Meta (Acharya Decl. Row 12) | |
| 795-01 | Ex. C1 | n. 35, parenthetical after “PALM-013460551” | Meta (Acharya Decl. Row 13) | |
| 795-01 | Ex. C1 | n. 35, parenthetical after “PX 1711 at 349” | Meta (Acharya Decl. Row 14) | |
| 795-01 | Ex. C1 | n. 38, parenthetical after “ <i>see also</i> PX 1710” | Meta (Acharya Decl. Row 15) | |
| 795-01 | Ex. C1 | n. 38, parenthetical after “S. Wang Dep. Tr. 207:23-208:3” | Meta (Acharya Decl. Row 16) | |
| 795-01 | Ex. C1 | n. 38, parenthetical after “221:18-24” | Meta (Acharya Decl. Row 17) | |
| 795-03 | Ex. C2 | Page PALM-012863800, between “everything we collected is still there” and “Per App/Dataset Info” | Meta (Acharya Decl. Row 18) | |
| 795-03 | Ex. C2 | Page PALM-012863800, between “video_type (ad or content)” and “Snapchat” | Meta (Acharya Decl. Row 19) | |
| 795-03 | Ex. C2 | Top of page PALM-012863801 until “We used it to measure” | Meta (Acharya Decl. Row 20) | |
| 795-03 | Ex. C2 | Page PALM-012863801, between “MS team and others” and “Summary of types of analyses conducted” | Meta (Acharya Decl. Row 21) | |
| 795-04 | Ex. C3 | Body of email sent at 8:33 AM | Meta (Acharya Decl. Row 22) | |
| 795-04 | Ex. C3 | Email addresses of Meta employees as highlighted | Meta (Acharya Decl. Row 23) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------|
| | | in exhibit | | |
| 795-05 | Ex. C4 | Email addresses of Meta employees as highlighted in exhibit | Meta (Acharya Decl. Row 24) | |
| 795-06 | Ex. C5 | Page PALM-004966275, all rows with the exception of “FB Inc. Snap S-1 analyses” row, as highlighted in exhibit | Meta (Acharya Decl. Row 25) | |
| 795-06 | Ex. C5 | Email addresses of Meta employees as highlighted in exhibit | Meta (Acharya Decl. Row 26) | |
| 795-07 | Ex. C6 | All text with the exception of: (a) Page PALM-005538382, bullet between “Immediate Impact” and “strategic apps” (b) Page PALM-005538382, bullet between “Long term strategic impact” and “in years” as highlighted in exhibit | Meta (Acharya Decl. Row 27) | |
| 795-08 | Ex. C7 | Entire document | Meta (Acharya Decl. Row 28) | |
| 795-10 | Ex. C8 | Email addresses of Meta employees as highlighted in exhibit | Meta (Acharya Decl. Row 29) | |
| 795-16 | Ex. C9 | Entire document | Meta (Acharya Decl. Row 30) | |
| 795-17 | Ex. C10 | Entire document | Meta (Acharya Decl. Row 31) | |
| 795-19 | Ex. C11 | ¶ 17, percentage | Meta (Acharya Decl. Row 32) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------------------------------------------------------------------------------------|---------------------------|-----------------------------------------------------------------------------------------------|---------------------------------------|--------|
| 795-19 | Ex. C11 | ¶ 65, first sentence | Meta (Acharya Decl. Row 33) | |
| 795-19 | Ex. C11 | ¶ 65, between “And the price is set by the auction” and “Q. Okay. So there” | Meta (Acharya Decl. Row 34) | |
| 795-19 | Ex. C11 | n. 64, after “These ads were called “Reach and Frequency” ads.” through end of footnote | Meta (Acharya Decl. Row 35) | |
| 795-19 | Ex. C11 | Page 71, final row, from “An internal Twitter report on” to the end of the paragraph. | X Corp (Birkenfeld-Malpass Decl. ¶ 6) | |
| 795-19 | Ex. C11 | page 74-75, between “PALM-007492375, p. 8.” and “(See PALM- 007648629, pp. 8, 11, 21).” | Meta (Acharya Decl. Row 36) | |
| 795-19 | Ex. C11 | p. 75, between “PALM- 006846145-154, at 147” and “(See PX 666 (PALM- 006077774-796, at 790))” | Meta (Acharya Decl. Row 37) | |
| Meta’s Opposition to Advertisers’ Motion for Class Certification (Dkt. No. 801) | | | | |
| 801-01 | Ex. D1 | 17:18, between “source of” and “of all advertising” | Meta (Acharya Decl. Row 38) | |
| 801-01 | Ex. D1 | 17:22, between “for just” and “of advertising” | Meta (Acharya Decl. Row 39) | |
| 801-01 | Ex. D1 | 17:22, between “less than” and “of” | Meta (Acharya Decl. Row 40) | |
| 801-01 | Ex. D1 | 17:25, between “with only” and “of ad spend” | Meta (Acharya Decl. Row 41) | |
| 801-01 | Ex. D1 | 17:25, between “just over” and “of advertisers” | Meta (Acharya Decl. Row 42) | |
| 801-01 | Ex. D1 | 24:23-24, between “among others” and “The named plaintiffs” | Meta (Acharya Decl. Row 43) | |
| 801-01 | Ex. D1 | 24:23-24, Reference to party | Vanderslice Decl. Ex. A1, ¶ 3 | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------|---------------------------|----------------------------------------------------------------------------|-----------------------------|--------|
| 801-02 | Ex. D2 | 85:8, between "about that" and "percent" | Meta (Acharya Decl. Row 44) | |
| 801-02 | Ex. D2 | 87:18, beginning of line until "percent" | Meta (Acharya Decl. Row 45) | |
| 801-02 | Ex. D2 | 88:8, between "is your" and "percent" | Meta (Acharya Decl. Row 46) | |
| 801-02 | Ex. D2 | 88:11, between "the" and "percent" | Meta (Acharya Decl. Row 47) | |
| 801-02 | Ex. D2 | 88:18-19, between "like" and "Something" | Meta (Acharya Decl. Row 48) | |
| 801-02 | Ex. D2 | 113:1-4 | Meta (Acharya Decl. Row 49) | |
| 801-02 | Ex. D2 | 113:7-21 | Meta (Acharya Decl. Row 50) | |
| 801-02 | Ex. D2 | 114:20-115:4 | Meta (Acharya Decl. Row 51) | |
| 801-02 | Ex. D2 | 115:16-116:8 | Meta (Acharya Decl. Row 52) | |
| 801-04 | Ex. D3 | ¶ 2, percentage in third sentence | Meta (Acharya Decl. Row 53) | |
| 801-04 | Ex. D3 | ¶ 16, final sentence | Meta (Acharya Decl. Row 54) | |
| 801-04 | Ex. D3 | n. 15 | Meta (Acharya Decl. Row 55) | |
| 801-04 | Ex. D3 | ¶ 22, between "targeting decreased from" and "percent" | Meta (Acharya Decl. Row 56) | |
| 801-04 | Ex. D3 | ¶ 22, between "beginning of the Class Period to" and "percent" | Meta (Acharya Decl. Row 57) | |
| 801-04 | Ex. D3 | Ex. III.B.1.1, percentages | Meta (Acharya Decl. Row 58) | |
| 801-04 | Ex. D3 | Ex. III.B.1.2 | Meta (Acharya Decl. Row 59) | |
| 801-04 | Ex. D3 | Ex. III.B.1.3, percentages | Meta (Acharya Decl. Row 60) | |
| 801-04 | Ex. D3 | ¶ 24, between "During the Class Period" and "percent of ad spend" | Meta (Acharya Decl. Row 61) | |
| 801-04 | Ex. D3 | ¶ 24, between "During the Class Period, only" and "percent of advertisers" | Meta (Acharya Decl. Row 62) | |
| 801-04 | Ex. D3 | ¶ 24, between "For example, during the Class | Meta (Acharya Decl. Row 63) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------|
| 1 | | Period,” and “percent of ad spend” | | |
| 2 | | | | |
| 3 | | | | |
| 4 | 801-04 | Ex. D3 ¶ 24, between “During the Class Period,” and “percent of the advertisers” | Meta (Acharya Decl. Row 64) | |
| 5 | | | | |
| 6 | 801-04 | Ex. D3 n. 24, between “Additionally,” and “of ad spend” | Meta (Acharya Decl. Row 65) | |
| 7 | | | | |
| 8 | 801-04 | Ex. D3 n. 24, between “on Instagram used direct connections targeting,” and “of ad spend” | Meta (Acharya Decl. Row 66) | |
| 9 | | | | |
| 10 | 801-04 | Ex. D3 n. 24, between “on Messenger used direct connections targeting,” and “of ad spend on Audience Network” | Meta (Acharya Decl. Row 67) | |
| 11 | | | | |
| 12 | 801-04 | Ex. D3 n. 25, between “Additionally,” and “advertisers on Instagram” | Meta (Acharya Decl. Row 68) | |
| 13 | | | | |
| 14 | 801-04 | Ex. D3 n. 25, between “Instagram used direct connections targeting,” and “of advertisers on Messenger” | Meta (Acharya Decl. Row 69) | |
| 15 | | | | |
| 16 | 801-04 | Ex. D3 n. 25, between “Messenger used direct connections targeting, and” and “of advertisers on Audience Network” | Meta (Acharya Decl. Row 70) | |
| 17 | | | | |
| 18 | 801-04 | Ex. D3 n. 26, between “Additionally,” and “ad spend on Instagram” | Meta (Acharya Decl. Row 71) | |
| 19 | | | | |
| 20 | 801-04 | Ex. D3 n. 26, between “Instagram used either direct connections targeting or friends of connections targeting,” and “of ad spend on Messenger” | Meta (Acharya Decl. Row 72) | |
| 21 | | | | |
| 22 | 801-04 | Ex. D3 n. 26, between “Messenger used either direct connections targeting or friends of | Meta (Acharya Decl. Row 73) | |
| 23 | | | | |
| 24 | | | | |
| 25 | | | | |
| 26 | | | | |
| 27 | | | | |
| 28 | | | | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------|--------|
| | | connections targeting, and” and “of ad spend on Audience Network” | | |
| 801-04 | Ex. D3 | n. 27, between “Additionally,” and “advertisers on Instagram” | Meta (Acharya Decl. Row 74) | |
| 801-04 | Ex. D3 | n. 27, between “Instagram used either direct connections targeting or friends of connections targeting,” and “of advertisers on Messenger” | Meta (Acharya Decl. Row 75) | |
| 801-04 | Ex. D3 | n. 27, between “Messenger used either direct connections targeting or friends of connections targeting, and” and “of advertisers on Audience Network” | Meta (Acharya Decl. Row 76) | |
| 801-04 | Ex. D3 | n. 44, between “They’re a small part of Facebook’s ad revenue, about” and “percent” | Meta (Acharya Decl. Row 77) | |
| 801-04 | Ex. D3 | Ex. IV.C.1.1 | Meta (Acharya Decl. Row 78) | |
| 801-04 | Ex. D3 | ¶ 41, between “Exhibit IV.C.1.2 shows that” and “This suggests that” | Meta (Acharya Decl. Row 79) | |
| 801-04 | Ex. D3 | Ex. IV.C.1.2 | Meta (Acharya Decl. Row 80) | |
| 801-04 | Ex. D3 | n. 84, between “They’re a small part of Facebook’s ad revenue, about” and “percent” | Meta (Acharya Decl. Row 81) | |
| 801-04 | Ex. D3 | Ex. IV.C.4.1 | Meta (Acharya Decl. Row 82) | |
| 801-04 | Ex. D3 | ¶ 64, between “similar to a” and “where advertisers bid for each individual ad placement” | Meta (Acharya Decl. Row 83) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------|---------------------------|-------------------------------------------------------------------------------------------|-----------------------------|--------|
| 801-04 | Ex. D3 | ¶ 64, between “highest ‘quality’ adjusted bid wins” and “Therefore,” | Meta (Acharya Decl. Row 84) | |
| 801-04 | Ex. D3 | ¶ 64, between “valuations of the impression being auctioned” and “In other words,” | Meta (Acharya Decl. Row 85) | |
| 801-04 | Ex. D3 | n. 118, between “the auction mechanism is” and “which is the minimum amount” | Meta (Acharya Decl. Row 86) | |
| 801-04 | Ex. D3 | Exhibit VI.A.1. 118, between “set their bid at to win the auction” and “see, for example” | Meta (Acharya Decl. Row 87) | |
| 801-04 | Ex. D3 | ¶ 65, between “in fact shared by the” and “that Meta uses” | Meta (Acharya Decl. Row 88) | |
| 801-04 | Ex. D3 | ¶ 65, between “winning price in” and “such as participating” | Meta (Acharya Decl. Row 89) | |
| 801-04 | Ex. D3 | ¶ 65, Exhibit VI.A.1 title, between “Meta’s” and “and Car” | Meta (Acharya Decl. Row 90) | |
| 801-04 | Ex. D3 | ¶ 65, Exhibit VI.A.1, lefthand column name, after “Meta’s” | Meta (Acharya Decl. Row 91) | |
| 801-04 | Ex. D3 | ¶ 67, between “striking because” and “are ‘conceptually similar’” | Meta (Acharya Decl. Row 92) | |
| 801-04 | Ex. D3 | ¶ 67, between “As such, in both a” and “and in a multilateral negotiation” | Meta (Acharya Decl. Row 93) | |
| 801-04 | Ex. D3 | n. 123, beginning of footnote until “See also, Thomas” | Meta (Acharya Decl. Row 94) | |
| 801-04 | Ex. D3 | n. 124 | Meta (Acharya Decl. Row 95) | |
| 801-04 | Ex. D3 | ¶ 69, between “specific discounts can range anywhere from” and “Meta ad credits” | Meta (Acharya Decl. Row 96) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|----------|---------------------------|------------------------------------------------------------------------------|-------------------------------|--------|
| 801-04 | Ex. D3 | ¶ 69, between “in 2018, Meta budgeted” and “for ‘Overall Ad Credits’” | Meta (Acharya Decl. Row 97) | |
| 801-04 | Ex. D3 | ¶ 69, between “A portion of this” and “was earmarked” | Meta (Acharya Decl. Row 98) | |
| 801-04 | Ex. D3 | n. 125, between “range from” and “%.”” | Meta (Acharya Decl. Row 99) | |
| 801-04 | Ex. D3 | ¶ 70, between “reached as high as” and “percent during the class period.” | Meta (Acharya Decl. Row 100) | |
| 801-04 | Ex. D3 | ¶ 71, between “bespoke agreements with Meta” and “Some advertisers have” | Meta (Acharya Decl. Row 101) | |
| 801-04 | Ex. D3 | ¶ 71, between “negotiated credits” and “Across these agreements.” | Meta (Acharya Decl. Row 102) | |
| 801-04 | Ex. D3 | ¶ 71(a), after “magnitude of the” through end of sentence | Vanderslice Decl. Ex. A-1a | |
| 801-04 | Ex. D3 | nn. 132-136 | Meta (Acharya Decl. Row 104) | |
| 801-04 | Ex. D3 | n. 132 | Vanderslice Decl. Ex. A-1a | |
| 801-04 | Ex. D3 | n. 132 | Netflix (Celedonia Decl. ¶ 7) | |
| 801-04 | Ex. D3 | n. 133 | Vanderslice Decl. Ex. A-1a | |
| 801-04 | Ex. D3 | n. 134 | Vanderslice Decl. Ex. A-1a | |
| 801-04 | Ex. D3 | n. 135 | Vanderslice Decl. Ex. A-1a | |
| 801-04 | Ex. D3 | n. 136 | Netflix (Celedonia Decl. ¶ 7) | |
| 801-06 | Ex. D4 | 1687:1-4, from beginning of line 1687:1 until “With this agreement in place” | Meta (Acharya Decl. Row 105) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|---------------------------------------------------------------------------------------|---------------------------|--------------------------------------------------------------------|------------------------------|--------|
| 801-06 | Ex. D4 | 1688:13-15, after “could be construed as” through end of paragraph | Meta (Acharya Decl. Row 106) | |
| 801-06 | Ex. D4 | n. 6194 | Meta (Acharya Decl. Row 107) | |
| 801-06 | Ex. D4 | n. 6195 | Meta (Acharya Decl. Row 108) | |
| 801-06 | Ex. D4 | n. 6197 | Meta (Acharya Decl. Row 109) | |
| 801-06 | Ex. D4 | 1692:21-25 | Vanderslice Dec. Ex. A-1b | |
| 801-07 | Ex. D5 | 145:20, between “few was” and “percent” | Meta (Acharya Decl. Row 110) | |
| 801-07 | Ex. D5 | 145:20-21, between “down to” and “percent” | Meta (Acharya Decl. Row 111) | |
| 801-07 | Ex. D5 | 146:4, between “you know,” and “percent” | Meta (Acharya Decl. Row 112) | |
| 801-07 | Ex. D5 | 146:5, between “percent.” and “percent is certainly few” | Meta (Acharya Decl. Row 113) | |
| 801-07 | Ex. D5 | 150:3, between “believe the” and “or the –I” | Meta (Acharya Decl. Row 114) | |
| 801-07 | Ex. D5 | 150:4, between “cited the” and “contract” | Meta (Acharya Decl. Row 115) | |
| 801-11 | Ex. D6 | 91:16-17, between “at 0480” and “The predicate task” | Meta (Acharya Decl. Row 116) | |
| 801-11 | Ex. D6 | 110:10-17, between “would likely have” and “PALM-006799270” | Meta (Acharya Decl. Row 117) | |
| Advertisers' Reply in Support of Motion for Class Certification (Dkt. No. 813) | | | | |
| 813-01 | Ex. E | 7:5-6, between “stating that” and “and discussing” | Meta (Acharya Decl. Row 167) | |
| 813-01 | Ex. E | 7:7, between “discussing which” and “to” | Meta (Acharya Decl. Row 168) | |
| 813-01 | Ex. E | 7:7-8, between “to” and “Meta internally measured” | Meta (Acharya Decl. Row 169) | |
| 813-01 | Ex. E | 9:18-19, between “clickthrough rates and,” and “Williams Reply” | Meta (Acharya Decl. Row 170) | |
| Advertisers' Proffer Regarding Expert Testimony (Dkt. No. 824) | | | | |
| 824-03 | Ex. F | 6:16-17, between “the company that” and “—a | Meta (Acharya Decl. ¶ 171) | |

| Dkt. No. | Vanderslice Decl. Exhibit | Portion of Document Sought to Be Sealed | Designating Party | Ruling |
|---------------------------------------------------------------------------------------------|---------------------------|---------------------------------------------------------------------------------------|----------------------------|--------|
| | | technological way” | | |
| 824-03 | Ex. F | 6:18-19, between “like Facebook’s—” and “PALM-008758432” | Meta (Acharya Decl. ¶ 172) | |
| 824-03 | Ex. F | 6:20-23, between “PALM-008758435-36.” and “ <i>Id.</i> Dr. Jakobsson” | Meta (Acharya Decl. ¶ 173) | |
| Meta's Errata to Advertiser Class Rebuttal Report of Catherine Tucker (Dkt. No. 828) | | | | |
| 828-01 | Ex. G | Language in “Original Text” and “Corrected Text” columns | Meta (Acharya Decl. ¶ 174) | |
| 828-01 | Ex. G | Reference to party and contract terms in “Original Text” and “Corrected Text” columns | Vanderslice Decl. Ex. A-1a | |

Dated: _____

JAMES DONATO
 United States District Judge